

THE CITY OF NEW YORK LAW DEPARTMENT 100 CHURCH STREET

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October 31, 2017

BY ECF

ZACHARY W. CARTER

Corporation Counsel

Honorable Steven L. Tiscione United States Magistrate Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: <u>Lashana Weaver v. Bentley Warrington</u> 14-CV-7097 (ENV) (ST)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendant Bentley Warrington in the above-referenced matter. I write to respectfully request that the deadline for completion of fact discovery be extended to December 1, 2017 and that the deadline for beginning dispositive motion practice be extended until January 2, 2018.

The parties had planned to complete plaintiff's deposition this week. However, when I called plaintiff yesterday to confirm, she informed me that she is currently in Florida for a funeral, and will not be back in New York at least until the end of the week. Accordingly, we have rescheduled plaintiff's deposition to Monday, November 6, 2017.

Additionally, plaintiff has advised that she intends to depose the defendant as well as a non-party. Plaintiff further advises that she is still looking for a new attorney to take her case. Although plaintiff did not ultimately retain the last few attorneys that she spoke with, plaintiff advises that she is speaking another attorney who is interested in her case.

For the reasons discussed herein, the parties respectfully request that the deadline for completion of fact discovery be extended to December 1, 2017 and that the deadline for beginning dispositive motion practice be extended until January 2, 2018.

I think the Court for its time and consideration in this regard.

Respectfully submitted,

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Matthew W. McQueen

cc: Lashana Weaver (by U.S. Mail and E-Mail)

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